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Via Electronic Filing

Federal Communications Commission
Marlene H. Dortch, Secretary
445 12th Street S.W.
Washington, D.C. 20554

Re: Petition for Expedited Declaratory Ruling by Vincent Lucas
CG Docket No. 02-278, DA 14-976

Dear Commission:

Please accept these comments and enclosures in support of the declaratory ruling sought by Vincent Lucas in the above-referenced proceeding. I am also currently involved in TCPA-related litigation (in New York state court) with Pacific Telecom Communications Group, International Telephone Corporation, Telephone Management Corporation, F. Antone Accuardi and Steve Hamilton (together, the "Pacific Telecom Group").

In the course of that litigation, the Pacific Telecom Group has contended that any liability for TCPA violations, if any, could only lie with International Telephone Corporation, the Belize-based entity which the Pacific Telecom Group formed and which has defaulted in the litigation (the Pacific Telecom Group has defended the U.S.-based individuals and entities by denying that New York courts have personal jurisdiction over them). The Belizean entity is operated from the same Portland, Oregon offices as the U.S. entities, and the circumstances clearly indicate that it was formed in Belize specifically in an attempt to avoid TCPA liability. The Pacific Telecom Group's business model is structured in such a way as to provide access to the U.S. telecommunications to overseas telemarketers and/or to provide a means by which domestic telemarketers can shield themselves from TCPA liability.

The following information and documents are respectfully submitted for the Commission's consideration with respect to the petition:

1. The Pacific Telecom Group's business model is extremely lucrative. The "CNAM" or "dip" revenue described in the petition – where the Pacific Telecom Group received compensation based upon queries to the Caller ID databases, and which the Pacific Telecom Group shares with the telemarketers through its "CNAM Revenue Sharing Program" – generated at least \$2.6 million for the Pacific Telecom Group between September, 2011, and June, 2013. In response to a subpoena in the litigation, Transaction Network Services, Inc. ("TNS"), an operator of one of the CNAM databases, produced a spreadsheet showing payments to Pacific Telecom Communications Group for these amounts (**Appendix A**).¹ It is also noteworthy

¹ The invoices correlating to the amounts indicated on the spreadsheet were also produced by TNS. They were omitted due to their size, but are available upon request.

that the invoices reveal that the numbers controlled by the Pacific Telecom Group were used almost exclusively for placing outbound calls (thus maximizing the revenue to the Pacific Telecom Group). In July, 2012, alone, the Pacific Telecom Group's numbers caused over 175 million "dips" into the TNS database, earning \$271,026 from TNS.

2. The Pacific Telecom Group points the finger for any TCPA violations at its own affiliate in Belize, International Telephone Corporation. An affidavit sworn to by Steve Hamilton (**Appendix B**) confirms that Pacific Telecom Communications Group, the entity which has access to the U.S. telecommunications system, describes the supposed relationship between the two companies. The Pacific Telecom Group admits that both entities are under common ownership. If the Commission were to rule that by using an overseas affiliate an organization could sidestep liability for TCPA violations, numerous copycats will undoubtedly begin to operate using that model, essentially rendering the TCPA unenforceable by consumers, despite Congressional intent to the contrary.
3. The Pacific Telecom Group operates with the same individuals and organizations which have been the subject of prior Federal Trade Commission ("FTC") enforcement actions for illegal robocalling schemes. In 2011, the FTC sued Roy M. Cox, Jr. and several domestic and overseas entities he controlled (the "Cox Group") for violations of the Telemarketing Sales Rule in connection with a robocalling scheme. Subsequently, the FTC entered into a stipulated judgment and permanent injunction with the Cox Group. Email correspondence produced by the Pacific Telecom Group in its litigation with me reveals that the Pacific Telecom Group was actively supporting the Cox Group's operations and ability to engage in its robocalling scheme (**Appendix C**). The Pacific Telecom Group confirmed that it was paying 72.5% of "dip" revenue it received back to the Cox Group. Fred Accuardi (of the Pacific Telecom Group) also confirmed his disappointment when "Roy has only done 3mm+ this month compared to 22mm last month," but it was good news to know that Cox "says he is pushing to go to 30 million dips by [M]arch 1."

If I can provide the Commission with any additional information, please do not hesitate to contact me. The Commission's consideration of this matter is greatly appreciated.

Sincerely,

/s/

Michael R. Wood

Att.

Appendix A

Invoice Date	Invoice ID	Billable Subscriber ID	Billable Subscriber Name	Service Type Name	Oracle Item Description	Units	Amount
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	72,858	(\$117.30)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	44,799	(\$72.13)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	54,389	(\$91.37)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	95,815	(\$154.26)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	57,423	(\$116.57)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	640,699	\$0.00
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	166,657	(\$268.32)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	82,872	(\$133.42)
09/13/2011	1654227	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	13	(\$0.13)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	8,686,417	(\$13,985.13)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	5,626,198	(\$9,058.18)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	1,090	(\$12.21)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	2,409,117	(\$4,047.32)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	6,029,817	(\$9,708.01)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	35,198	(\$92.40)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	3,144,605	(\$6,383.55)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	9,474,797	\$0.00
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	4,746,961	(\$7,642.61)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	4,696,317	(\$7,561.07)
10/06/2011	1656268	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	88	(\$0.88)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	20,939,634	(\$33,712.81)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	13,572,826	(\$21,852.25)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	4,807	(\$53.84)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	4,628,125	(\$7,775.13)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	13,255,100	(\$21,340.71)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	76,962	(\$202.03)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	12,793,057	(\$25,969.91)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	19,148,142	(\$25,026.75)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	8,454,017	(\$13,610.97)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	6,738,466	(\$10,848.93)
11/03/2011	1659562	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	279	(\$2.79)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	22,390,662	(\$36,048.97)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	13,798,721	(\$22,215.94)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	9,310	(\$104.27)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,026,859	(\$10,124.94)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	14,273,170	(\$22,979.80)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	70,282	(\$184.49)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	5,552,693	(\$11,271.97)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	22,169,972	(\$29,510.78)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	8,076,143	(\$13,002.59)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	4,588,675	(\$7,387.77)
12/08/2011	1667867	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	303	(\$3.03)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	22,454,107	(\$36,151.11)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	10,247,665	(\$16,498.74)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	6,153	(\$68.91)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,630,090	(\$11,138.37)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	15,024,889	(\$24,215.48)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	37,991	(\$99.73)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	9,158,034	(\$18,590.81)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	27,286,248	(\$37,039.41)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	7,229,269	(\$11,639.12)
01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	4,098,763	(\$6,599.01)

01/09/2012	1671942	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	287	(\$2.87)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	22,759,660	(\$36,643.05)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	10,182,803	(\$16,394.31)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	5,824	(\$65.23)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,154,360	(\$10,339.03)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	11,214,646	(\$18,055.58)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	53,768	(\$141.14)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	8,670,807	(\$17,601.74)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	19,393,178	(\$24,547.45)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	5,381,051	(\$8,663.49)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	2,020,401	(\$3,252.85)
02/06/2012	1674718	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	252	(\$2.52)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	25,230,607	(\$40,621.28)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	12,545,262	(\$20,197.87)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	3,216	(\$36.02)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,821,996	(\$11,460.71)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	13,516,941	(\$21,762.28)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	96,206	(\$252.54)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	8,451,854	(\$17,157.26)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	26,156,831	(\$32,139.63)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	6,595,260	(\$10,618.37)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	2,105,639	(\$3,390.08)
03/05/2012	1678196	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	360	(\$3.60)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	40,553,398	(\$65,290.97)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	18,699,392	(\$30,106.02)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	6,903	(\$77.31)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	8,634,636	(\$14,506.03)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	21,198,579	(\$34,129.71)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	93,836	(\$164.21)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	13,798,855	(\$28,011.68)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	27,933,929	(\$34,454.04)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	11,968,290	(\$19,268.95)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	2,973,348	(\$4,787.09)
04/04/2012	1681242	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	705	(\$7.05)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	47,057,115	(\$75,761.96)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	15,974,347	(\$25,718.70)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	10,504	(\$57.99)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	8,373,793	(\$14,067.97)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	20,909,791	(\$33,664.76)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	38,378	(\$67.16)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	18,079,653	(\$36,701.70)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	25,480,253	(\$30,259.59)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	10,734,809	(\$17,283.04)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	4,182,713	(\$6,734.17)
05/03/2012	1685115	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	1,430	(\$14.30)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	58,580,796	(\$94,315.08)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Bell South [CNAM Database Compensation]	14,488	(\$23.33)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	GTE [CNAM Database Compensation]	26,428	(\$108.16)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	7,637,236	(\$12,830.56)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	24,131,972	(\$38,852.47)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	60,541	(\$105.95)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	8,883,085	(\$18,032.66)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	30,590,971	(\$36,490.37)

06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	14,390,118	(\$23,168.09)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	9,524,496	(\$15,334.44)
06/05/2012	1687897	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	2,544	(\$25.44)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	69,992,654	(\$112,688.17)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	9,945,333	(\$16,708.16)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	27,597,337	(\$44,431.71)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	34,243	(\$59.93)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	6,881,359	(\$13,969.16)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	35,401,416	(\$41,551.03)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	15,279,542	(\$24,600.06)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	10,501,788	(\$16,999.05)
07/05/2012	1691517	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	1,826	(\$18.26)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	48,651,825	(\$71,200.79)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,446,995	(\$11,604.59)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	17,741,016	(\$30,197.08)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	19,008	(\$35.64)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	6,101,906	(\$13,271.65)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	24,463,962	(\$31,381.13)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	10,966,890	(\$18,917.89)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	8,307,266	(\$14,330.03)
08/08/2012	1694361	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	773	(\$7.73)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	48,991,578	(\$72,635.43)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	5,734,209	(\$10,459.20)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	13,973,527	(\$21,998.72)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	51,669	(\$98.17)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	6,454,040	(\$14,224.70)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	19,274,518	(\$24,530.90)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	11,693,256	(\$20,439.81)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	7,662,952	(\$13,395.92)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	595	(\$5.95)
09/05/2012	1697856	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	TNS VERIFY COMPENSATION	NV:COMPENSATION	5	(\$0.04)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	40,392,372	(\$59,897.65)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	6,708,653	(\$12,236.58)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	13,971,753	(\$21,782.71)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	24,787	(\$47.10)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	8,419,564	(\$18,556.72)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	19,011,888	(\$24,552.23)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	9,255,553	(\$16,178.71)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	10,009,407	(\$17,497.32)
10/08/2012	1702350	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	363	(\$3.63)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	51,305,061	(\$76,066.95)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	7,127,295	(\$13,000.19)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	16,946,965	(\$26,254.51)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	133,022	(\$252.74)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	5,570,556	(\$12,277.51)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	22,086,019	(\$27,406.48)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	12,592,323	(\$22,011.38)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	21,574,175	(\$37,712.83)
11/05/2012	1706232	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	223	(\$2.23)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	9,259,396	(\$13,727.58)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	1,231,389	(\$2,246.05)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	2,759,226	(\$4,245.13)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	3,185	(\$6.05)

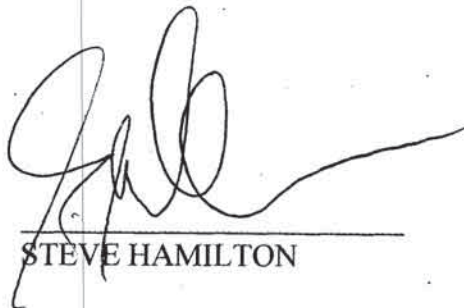
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	1,111,491	(\$2,449.73)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	3,833,685	(\$4,743.07)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	1,490,001	(\$2,604.52)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	1,336,271	(\$2,336.12)
12/05/2012	1708699	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	77	(\$0.77)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	5,122,790	(\$7,597.70)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	761,018	(\$1,388.10)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	2,107,083	(\$3,223.04)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	501	(\$0.95)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	801,105	(\$1,765.64)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	2,525,766	(\$3,086.23)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	976,129	(\$1,706.27)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	654,877	(\$1,144.79)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	116	(\$1.16)
01/07/2013	1712278	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	TNS VERIFY COMPENSATION	NV:COMPENSATION	8	\$0.00
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	5,919,395	(\$8,327.97)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	573,621	(\$1,002.69)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	2,312,539	(\$3,382.77)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	232	(\$0.44)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	954,422	(\$2,103.55)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	2,793,811	(\$3,437.32)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	873,347	(\$1,526.61)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	829,171	(\$1,449.45)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	257	(\$2.57)
02/06/2013	1715725	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	TNS VERIFY COMPENSATION	NV:COMPENSATION	12	\$0.00
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	1,010,725	(\$1,422.37)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	235,511	(\$411.67)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	271,588	(\$410.85)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SPIRIT TELECOM [CNAM DATABASE COMPENSATION]	282	(\$0.54)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	158,830	(\$350.06)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	655,730	(\$841.30)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	289,844	(\$506.65)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	127,675	(\$223.24)
03/05/2013	1718759	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	157	(\$1.57)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	143,598	(\$202.01)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	37,001	(\$64.68)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	112,102	(\$179.63)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	36,059	(\$79.47)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	107,417	(\$119.01)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	154,806	(\$270.60)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	25,673	(\$44.89)
04/03/2013	1722515	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	69	(\$0.69)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	162,871	(\$229.10)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	14,298	(\$24.99)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	62,546	(\$99.92)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	23,846	(\$52.56)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	68,124	(\$78.59)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	49,241	(\$86.07)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	24,683	(\$43.17)
05/03/2013	1725321	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	74	(\$0.74)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Ameritech [CNAM Database Compensation]	106,132	(\$149.27)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	QWEST [CNAM Database Compensation]	5,316	(\$9.29)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	SNET [CNAM Database Compensation]	34,205	(\$51.76)

06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Sprint / United [CNAM Database Compensation]	201	(\$0.44)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	VeriSign Database [CNAM Database Compensation]	39,095	(\$42.83)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon - NY [CNAM Database Compensation]	11,823	(\$20.67)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	CNAM Database Compensation	Verizon PA [CNAM Database Compensation]	9,642	(\$16.89)
06/05/2013	1728716	708,330	B - PACIFIC TELECOM COMMUNICATIONS GROUP, INC	LIDB Database Compensation	LIDB Compensation	22	(\$0.22)


Appendix B

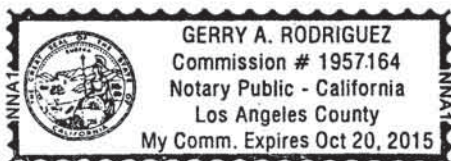
to make available to ITC automatic number identification "ANI's") which are used when, during the transmission of a telephone call, a telecommunications carrier requires a database for the caller identifiable information assigned to an ANI. Per the Revenue Share Agreement, PTCG and ITC shared revenue generated from such requires, while the telecommunication carrier generated revenues from the call recipient subscribing to caller-id services.

4. The foregoing agreements represent transactions which occur in a very limited niche of the telecommunications industry. PTCG keeps the contents of the agreements confidential, as to do otherwise would permit a competitor to identify 1) how the transaction are structured, 2) the pricing and revenue sharing mechanism per the agreements 3) the very existence of this market opportunity and 4) other material contract terms not publically available. The agreement is a culmination of PTCG investments of substantial time and resources.


STEVE HAMILTON

Sworn to before me this 8th
day of August, 2013


NOTARY PUBLIC



State of California
County of Los Angeles

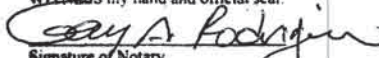
On August 8, 2013 before me, Gerry A. Rodriguez, Notary Public,

personally appeared Steve Hamilton
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s)
is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the
same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the
instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the
instrument

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing
paragraph is true and correct.

WITNESS my hand and official seal.

(Seal)


Signature of Notary

Appendix C

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Thursday, January 19, 2012 7:13 AM
To: Steve Hamilton
Subject: SNET Paid today \$21,648.22

Steve,

Hope you are feeling better.

Is this all Roy? If so, shall I pay him 72.5%?

--

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Monday, January 23, 2012 11:08 AM
To: Steve Hamilton
Subject: Re: Roy Comp Nov 2011

S,

Will do.

F

On 1/23/12 10:45 AM, Steve Hamilton wrote:

> Ok, I suggest to send him \$29,000.
> My calculations are pretty similar.
> He said he was not happy when we took extra money last month.
> Thanks.
>
> Steve
>
>
> -----Original Message-----
> From: Fred Accuardi [mailto:f.a@inttelephone.com]
> Sent: Saturday, January 21, 2012 1:53 PM
> To: Steve Hamilton
> Subject: Roy Comp Nov 2011
>
> Steve,
>
> This is what I calculate for Roy
>
> Will wire first thing Monday morning.
>

--

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Monday, January 23, 2012 1:25 PM
To: Steve Hamilton
Subject: wire to Roy

Wire went out to Roy 29K

--

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Tuesday, January 31, 2012 8:28 PM
To: Steve Hamilton
Subject: Re: Cox

Steve.

Good news! Anything from Keith?

Fred

On 1/31/12 10:24 AM, Steve Hamilton wrote:

> From what I hear, is that he completely shutdown his previous
> relationships with all the old companies as of the end of the year.
> What we are seeing now is a totally new business.
> He says he is waiting for new T1s to be installed and is only limited
> because of capacity.
> Now he says he is pushing to go to 30 million dips by march 1

>

> -----Original Message-----

> From: Fred Accuardi [mailto:f.a@inttelephone.com]

> Sent: Monday, January 30, 2012 12:12 PM

> To: Steve Hamilton

> Subject: Cox

>

> Steve,

>

> FYI

>

> Reviewing the "pending" numbers on the website, I noticed that Roy has

> only done 3mm+ this month compared to 22mm last month.

>

>

> Best Regards,

>

> Fred Accuardi

> Manager

> Fax: 503/296-2500

> Cell:503/348-3448

>

>

--

Best Regards,

Fred Accuardi

Manager

Fax: 503/296-2500

Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Thursday, February 23, 2012 1:38 PM
To: Steve Hamilton
Subject: Cox

Steve,

These are my calculations for December Payout to Roy

	TNSI	SNET Payment	Total Wired
Dips	22,647,408		
Average Pay	\$0.001583		
	\$35,848.58	\$17,524.71	
Cox %	72.50%	72.50%	
Owed to Cox	\$25,990.22	\$12,705.41	\$38,695.64 Pd Feb22,2012

--

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Tuesday, March 20, 2012 9:09 AM
To: Steve Hamilton
Subject: Fwd: Cox

This is what I paid on.

Fred

----- Original Message -----

Subject: Cox
Date: Thu, 23 Feb 2012 13:38:03 -0800
From: Fred Accuardi <f.a@inttelephone.com>
Reply-To: f.a@inttelephone.com
Organization: International Telephone Corporation
To: Steve Hamilton <Steve@pacifictelecommunications.com>

Steve,

These are my calculations for December Payout to Roy

	TNSI	SNET Payment	Total Wired
Dips	22,647,408		
Average Pay	\$0.001583		
	\$35,848.58	\$17,524.71	
Cox %	72.50%	72.50%	
Owed to Cox	\$25,990.22	\$12,705.41	\$38,695.64 Pd Feb22,2012

--

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Friday, March 30, 2012 9:07 AM
To: Steve Hamilton
Subject: Re: CABS revenue time frame

On 3/30/12 7:07 AM, Steve Hamilton wrote:

CABS revenue time frame:

We billed the Nov 2011 traffic on Dec 24 2011

The bills are net 30 so they are due jan 24 2011

The payments was made on 3/30/2011

This is typical how most vendors will pay initially

My hope is that behind the scenes while this is taking place that I would shave at least 45 days out of it.

When I was doing the same thing with Wildgate and Digitcom we got payments within 45 days total after the end of the month as everything was net30 clean

Steve,

Did we get payments on 3/30/2011?

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Wednesday, May 2, 2012 1:03 PM
To: Steve Hamilton
Subject: Roy Cox

Received

SNET	16-Mar	27-Apr
	\$28,068.82	\$17,131.75
	72.5%	72.5%
	\$20,349.89	\$12,420.52
Paid	\$6,000.00	
Balance	\$14,349.89	\$12,420.52

How much of this money was generated by Roy Cox:

Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell: 503/348-3448

steve hamilton

From: Fred Accuardi <f.a@inttelephone.com>
Sent: Wednesday, May 2, 2012 3:52 PM
To: Steve Hamilton
Subject: Re: please help

On 5/2/12 3:19 PM, Steve Hamilton wrote:

I am still at TNSI.
Can you please put together a TNSI overall report for me
Dips by month from the date we started with them.

Column 1 = Month
Column 2 = total number of dips for that month

Month	Queries
Sep-11	38,152,152
Oct-11	101,749,071
Nov-11	98,510,394
Dec-11	102,354,780
Jan-12	86,164,140
Feb-12	98,715,339
Mar-12	145,922,206
Apr-12	150,865,767

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Best Regards,

Fred Accuardi
Manager
Fax: 503/296-2500
Cell:503/348-3448